

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

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TEXAS STATE CONFERENCE OF  
NAACP BRANCHES,

Plaintiff,

v.

GREG ABBOTT, in his official capacity as Governor of Texas; RUTH HUGHS, in her official capacity as Texas Secretary of State;

Defendants.

Case No. 1:20CV1024-RP

Related to:

*Texas League of United Latin American Citizens v. Abbott*, No. 1:20-cv-1006

*Straty v. Abbott*, No. 120-cv-1015

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**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff Texas State Conference of NAACP Branches, for the reasons set forth in the memorandum of law filed concurrently with this Motion, as supported by the exhibits and declarations submitted therewith, respectfully moves for an order:

(1) temporarily restraining Defendants, and their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, from taking any action to inhibit county election administrators from offering more than one drop-off location for ballots in their respective counties for the November 2020 election;

(2) preliminarily enjoining Defendants and their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, from taking any action to inhibit county election administrators from offering more than one drop-off location for ballots in their respective counties for the November 2020 election; and

(3) granting such other or further relief as the Court deems just and proper.

In addition, Plaintiff respectfully requests leave of the Court to participate in the October 8, 2020 hearing in the related cases.

Plaintiff has conferred with Defendants on the request to participate in the hearing as well as the general substance of this Motion. Defendants have advised Plaintiff that they oppose Plaintiff's participation in the October 8 hearing.

Dated: October 7, 2020

Respectfully submitted,

/s/ Robert Notzon

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**Counsel for Plaintiffs –**

**\* Pro hac vice motion forthcoming**